

Exhibit “A”

Part 2 of 5

Legrome D. Davis. (2 pages, transmitting Agere's CERCLA 104(e) responses AGER000001 through AGER000120). Undated.

Lucent Technologies July 25, 1997 correspondence to USEPA, includes May 14, 1973 Western Electric correspondence to Commonwealth of PADER. BSAI0131216 – 312120

Deposition of Marianne Santarelli, February 22, 2005, including the following exhibits:

Santarelli 2 – USEPA, March 19, 1997, Correspondence to Western Electric Company c/o Lucent Technologies. AGER000040 – 000059.

Santarelli 3 – Lucent Technologies, May 9, 1997, Correspondence to USEPA. AGER000060 – 000068.

Santarelli 4 – Western Electric, September 30, 1976, Space Report Allentown Works. BSAI070641 – BSAI070661.

Santarelli 5 – Lucent Technologies, May 29, 1997, Correspondence to USEPA, AGER000069 – 0000118.

Santarelli 6 – AT&T, February 1, 1996 Correspondence to USEPA and USEPA, November 8, 1995, Correspondence to AT&T c/o Western Electric (Greensboro, NC), AGER000006 – 000039; and

Santarelli 7 – 1971 Western Electric/AT&T report on waste disposal for Allentown Works. (no Bates #s)

Jonas and DeRewal Chemical Company Employee DEPOSITIONS:

John C. Bean Deposition:

July 30, 2003 in Boarhead case

Karen Castillo Deposition:

June 3, 2003 in Boarhead case

Marion Chance Deposition:

May 14, 1997 by USEPA

Linda J. Cochran Deposition:

May 15, 2003 in Boarhead case

John Barsum Depositions:

June 4, 1997 by EPA

June 5, 1997 by EPA

April 28, 2000 Affidavit of John Barsum

September 8, 2003 in Boarhead case

Bruce DeRewal Depositions:

March 13, 1997 by EPA

June 16, 2003 in Boarhead case

Manfred F. DeRewal, Jr., Depositions:

February 26, 1997, by EPA

May 12 – 13, 2003 in Boarhead case

Manfred DeRewal, Sr., Depositions:
March 15 and 17, 1989 by EPA
December 10-11, 1996 by EPA
May 7 – 9, 2003, in Boarhead case

Joel Jerome Deposition:
January 6, 2005 in Boarhead case

Marvin Jonas Depositions:
April 14, 1986 by EPA
April 15, 1986 by NJDEP
April 17, 1986 (Lipari Landfill)
June 20, 1995 (Incollingo case)
July 18, 1995 (Incollingo case)

Franklin Pertnoy Deposition:
February 12, 1997 by EPA

Karen Porter Deposition:
July 30, 2003 in Boarhead case

Jeffrey Shaak Depositions:
June 25, 1997 by EPA
June 4, 2003 in Boarhead case

June Stephens Deposition:
July 28, 2003 in Boarhead case

Boarhead Farms Background Information materials:

CH2MHill, 1997. Final Remedial Investigation Report, Volume I, prepared for USEPA under Contract No. 68-W-0090. January 31, 1997.

Fourth Amended Complaint, 2005. Agere Systems et al v. Advanced Environmental Technology Corp. et al, Civil Action No. 02-CV-3830. Filed 8/1/2005.

Larson, Sarah, and Callaway, Brian, 2005. Newspaper article in the Intelligencer: "Long, Costly Battle", <http://www.phillyburbs.com/pb-dyn/news/113-11302005-576208.html>. November 30, 2005.

NUS Corporation, 1986. Site Inspection of Boarhead Farms Prepared Under TDD No. F3-8403-25, EPA No. PA-257, Contract No. 68-01-6699 for the Hazardous Site Control Division, U.S. Environmental Protection Agency, January 20, 1986. AR100173 – 256.

TetraTech/Black & Veatch, 2004. Remedial Action Oversight Report, Boarhead Farms Superfund Site, Operable Unit #2, Upper Black Eddy, Bucks County, Pennsylvania. June 25, 2004.

USEPA, 1987. NPL Site Narrative for Revere Chemical Co.

U.S. Environmental Protection Agency (USEPA), 1989. Record of Decision: DeRewal Chemical Co. EPA ID: NJD980761373, OU1, Kingwood Township, NJ. September 29, 1989. EPA/ROD/R02-89-087 1989.

USEPA, 1998a. Proposed Plan: Boarhead Farms Site, Bridgeton Township Bucks County, Pennsylvania. January 1998, <http://www.epa.gov/reg3hwmd/super/sites/PAD047726161/proposed/1998-01.htm>:

USEPA, 1998b. Record of Decision: Boarhead Farms EPA ID: PAD047726161, OU1, Bridgeton Township, PA. November 18, 1998. <http://www.epa.gov/superfund/sites/rods/fulltext/r0399009.pdf>

USEPA, 1996., Record of Decision: Revere Chemical Co., EPA ID: PAD051395499, OU2, Nockamixon Township, PA. June 20, 1996.

USEPA, 2001. Five-Year Review Report, Revere Chemical Co. Superfund Site.

USEPA website, 2004. Boarhead Farms Current Site Information. Last update: January 2004. <http://www.epa.gov/reg3hwmd/npl/PAD047726161.htm>

Settled Defendants Documents:

Bostik South:

1975-1976 Chemical Leaman and Matlack shipping documents, BSAI00186 – 2321.

Bostik South documents, BSAI012996 – BSAI013002.

Crown Metro, Inc., 2003. Information and Document Disclosure. March 20, 2003.

Emhart Industries, Inc. 2003. Information and Document Disclosure, with attachments EMHA0001-20. March 20, 2003.

Emhart Correspondences to USEPA, 1988. BSAI001860 – 5.

Ciba-Geigy:

Ciba-Geigy shipping records, 1976-1977. BSAI026638-745, BSAI004078 – 253.

Ciba Geigy, Vendor Value Listings 1974-1975. BSAI004046 – 77.

Ciba-Geigy, 1988. Response letter to USEPA June 10, 1988 request for information. July 25, 1988. BSAI004015-20.

Ciba Specialty Chemicals Corporation, 1997. Response to USEPA March 19 1997 letter. March 24, 1997. BSAI026746.

Novartis Corporation, 2003. Response to Case Management Order in Boarhead Farms Agreement Group v. AETC et. al. March 18, 2003. 3 pages.

USEPA, 1997. Request for information letter to Ciba Geigy Corporation, March 19, 1997. BSAI026749-769.

Knoll:

McNees, Wallace & Nurick, 2003. Correspondence to Glenn A. Harris, Esq., Re: Boarhead Farms Agreement Group V. Advanced Environmental Technology Corporation, et al., Civil Action No. 02-CV-3830 (J. Davis) – Information Disclosure on Behalf of Knoll, Inc. under February 3, 2002 Case Management Order. March 17, 2003.

Plymouth Tube:

Ellwood Ivins Tube Co., 1971. Department of the Army, Corps of Engineers, Application for Permit to Discharge or Work in Navigable Waters and Their Tributaries. June 10, 1971. BSAI032686 – 692.

Hawk, Hugh, 1977. Correspondence to PADER re: Hazardous Waste. May 24, 1977. BSAI005209.

Plymouth Tube Co., 1988. Correspondences to USEPA re Boarhead Farms Site. June 22, 1988, October 25, 1988. (BSAI000361, BSAI000358).

Copies of historical documents related to DeRewal Chemical Co. and Plymouth Tube Co. BSAI013067-079, BSAI052293 – 302, BSAI1020570, BSAI052294.

Quickline:

DeRewal Chemical Company, 1973. Invoice to Quickline Design, Inc. BSAI032908.

DeRewal Chemical Company, 1973. Copy of correspondence to F. Marchewka of Quickline Design, Inc. March 2, 1973. BSAI016524.

McAndrew, Patrick F. 1996. Letter to L. Miller of USEPA, re Boarhead Farms Site. February 1, 1996.

Schmidt, Sanford F. 2003. Letter to Glenn Harris re Quikline Design & Mfg. May 16, 2003.

Rohm and Haas:

Rohm and Haas Company, 2003. Initial Disclosure pursuant to February 3, 2003 Case Management Order, in the matter of BFAG v. AETC. March 19, 2003.

Simon Wrecking Co., Inc.:

Jonas ledger page entitled "Simon Wrecking Co. Williamsport", undated, no Bates #, included with materials labeled from a file "Boarhead Farms Superfund Site, 011938.074694, Jones 3-Ring Binder Pages Used by EPA, Redwell #24".

Morgan, Sharon Oras, 2003. Correspondence to Glenn Harris, re Boarhead Farms Group v. Simon Wrecking Co. Inc. et al. March 20, 2003

Handwritten notes (possibly from DeRewal Chemical Co. files?), Bates #'d BH 000 3959 and BSAI016578.

Unisys:

Enclosure D – BH 000 3962 through 3966, BH000 2554.1, BH 000 2554

Drinker, Biddle, & Reath, 2003. Transmittal of Unisys Corporation's submissions to the document repository. March 20, 2003.

Document Submission of Defendant Unisys Corporation pursuant to Case Management Order of February 3, 2003. UNIS-0001 through UNIS-0020.

Unisys, 1992. Correspondence to USEPA, Re: Boarhead Farms Site. November 12, 1992. PHKS027487 – 92.

Unisys, 1988. Correspondence to USEPA, Re: Boarhead Farms Site. July 19, 1988. BSAI001847 – 52.

United States Department of the Navy:

Sansonetti, Thomas L., 2003. United States' Filing Pursuant to Paragraph 3.B(3) of the Case Management Order, BFAG v. AETC, Civil Action No. 02-3830. March 19, 2003.

Defendants Exhibits:

D-18: City of Philadelphia Water Department correspondence to Manfred DeRewal, July 5, 1978. PKS003404 - 7.

D-23: Commonwealth of Pennsylvania Complaint/Warrant/Summons vs. Jeffrey Shaak, March 29, 1977. PHKS003230.

Plaintiffs Exhibits

P-2: Commonwealth of Pennsylvania Department of State Corporation Bureau, Articles of Incorporation for Penn Rare Metals, Inc. April 13, 1960. BSAI047200 -2.

P-3: Commonwealth of Pennsylvania, Articles of Incorporation for Echo, Inc. December 5, 1960. BSAI047211 - 3.

P-5: Commonwealth of Pennsylvania, Certificate of Incorporation, Boarhead Corporation. September 2, 1969. BSAI047227 -9.

P-6: Indenture between Alan R.Reim, Gail D. Reim, Robert W.Buckman, Ruth J. Buckmand and Boarhead Corporation, for sale of land in Bridgeton Township, Bucks County PA to Boarhead Corporation. October 16, 1969. BSAI000428.

P-7: Commonwealth of Pennsylvania, Certificate of Incorporation, DeRewal Chemical Company, Inc., December 29, 1969. BSAI047244.

P-20: Lease Agreement between Philadelphia Hide Corporation and Manfred DeRewal, December 1, 1973, PHKS003410.

P-21: DeRewal Chemical Company correspondence to Manfred T. DeRewal, July 23, 1970. AETC78.

P-22: Pennsylvania Department of Environmental Resources Waste Discharge Inspection Report, Boarhead Corporation, Lonely Cottage Road, Bucks County, Bridgeton Twp., February 14, 1973.

P-23: Pennsylvania Department of Environmental Resources Waste Discharge Inspection Report, Boarhead Corporation, March 5, 1973 inspection.

P-24: Agreement between Pennsylvania Department of Environmental Resources and Boarhead Corporation, March 21, 1973. BSAI017233 - 4.

P-25: City of Philadelphia Water Dept. correspondence to Manfred DeRewal, September 24, 1974. PHKS003282 -4.

P-26: City of Philadelphia correspondence to Manfred DeRewal, June 2, 1975.

P-27: Environmental Chemical Control certificate of incorporation, October 18, 1976. BSAI047236,

P-28: City of Philadelphia Dept. of Licenses and Inspections Violation Notice issued to Ed Meliti & Linda Cochran regarding 5001 Comly Street (Bldg R), April 5, 1977. PHKS003286 – 7.

P-29: City of Philadelphia v. Wissonoming Industrial Park et. al. Agreement, May 12, 1977. BSAI019670 – 1.

TABLES

Table I
American Cyanamid, Bound Brook NJ
Historical Waste Summary 1969 - 1977

Waste Type Generated	Period (Date)	# of 55-gal Drums	Gallons	Pounds	Tons	Cubic Yds	Tank Trucks
Based upon "Summary of Waste Shipments via Jonas, 1976 - 1978" (American Cyanamid, 1993)*:							
Flammable Solids	1976-1978			513,900			
Sodium Dichromate sludge	1976-1978		5,775	-			
Waste still bottoms (Bldg 872)	1976-1977	-	-	37,380			6
Distillation still pots	1976-1978	-		118,860			
Miscellaneous (includes zinc cake, solid organic waste, scrap chemicals [paint])	1977	49					
Waste NOX (poisonous liquid)	1976-1978		2,145	78,750			1
Flammable liquids (includes isopropanol, waste solvents)	1976-1978		42,900	1,171,660			24
Aqueous ammonia from DPA (diphenylamine process)	1976-1978			721,780			36
MBT tars	1976-1978		3,960	792,660			25
Poisonous solid	1976-1978			171,450			
Non-regulated solids & sludges (@450 lbs/drum) (includes organic pigments, methyl PNA sludge, aromatic polyurea sludge, Dibon waste sludge, polyacrylate polymer, polyurethane polymer)							
Subtotals for 1976-1978 (represents 2.33 years):	1976-1978	49	54,780	1,299,600	-		92
Extrapolated American Cyanamid records' 8-year total (multiply subtotal by 3.43)		168	187,895	16,827,717	-		316
Based on Jonas' records for liquid wastes for off-site disposal: bulk liquids/semi-liquids, Actual (per Jonas) hazardous/chemical liquids, Actual (per Jonas)	1974-1977 1974-1977		1,195,802 9,350,943				
Total Actual (based on Jonas records), four years	1974 - 1977		10,546,745				
Extrapolated Jonas 8-year Total (assumes waste generation for each of 1970, 1971, 1972 and 1973 was equivalent to the 1974 volumes):			14,921,473				

Notes/Assumptions:

Period of interest begins October 1969, when M. DeRural purchases BHF.

Period of interest ends in mid-late 1977.

Table II
National Rolling Mills, Malvern PA
Historical Waste Summary: 1969-1977

Waste Type and Amounts Generated	Period (Date)	# of 55-gal Drums	Gallons
Based on 1976 Jonas ledger: Waste acid	1976		580,000
Based on Jonas invoices and National Rolling Mills shipping documents: Waste/spent acid/ferric chloride	1975 (3 months)		81,100
	Total Actual:		661,100
Estimated annual waste volume	1975		324,400
Average Annual waste volume (1975+1976/2)			452,200
Extrapolated Total for National Rolling Mills 1970 through April 1974 (4 years, 4 months)			1,959,533

Table III
Philco Ford
Historical Waste Summary 1969-1977

Facility Location	Waste Type Generated	Period (Date)	# of 55-gal Drums	Container/transport type
Based on available invoices and purchase order documents: Watson town	"waste finishing material"	2/12/1973	62	drums
	"waste finishing material"	3/28/1973	120	drums
	"waste material - plastics"	4/12 - 19/1973	185	drums
	"waste material - plastics"	4/24/1973	62	drums
	"waste finishing material"	5/1/1973	63	drums
	"waste finishing material"	10/31/1973	60	drums
	"waste finishing material"	3/24/1972	63	drums
	"industrial waste solution"	7/10/1972	32	drums
	"waste finishing material"	8/17/1972	61	55-gallon drums
		Total:	708	

Notes/Assumptions:

No other historical waste generation/disposal information currently available for the Philco Ford facility.

Table IV
Standard Pressed Steel, Jenkintown PA
Historical Waste Summary: 1969-1977

Waste Type and Amounts Generated	Period (Date)	#of 55-gal Drums	Gallons
<i>Based on Standard Pressed Steel historical documents:</i>			
Acetone	Actual subtotal*	4	220
	Average/year	48	2,640
	Extrapolated Total for 8 years:	384	21,120
Chromic acid	Actual subtotal*	566	31,130
	Average/month	46	2,541
	Average/year	555	30,498
	Extrapolated Total for 8 years:	4,436	243,980
Cyanide waste	Actual subtotal*	309	21,495
	Average/month	31	1,819
	Average/year	377	21,825
	Extrapolated Total for 8 years:	3,016	174,600
Degreaser	Actual subtotal*	163	8,965
	Average/month	26	1,409
	Average/year	307	16,903
	Extrapolated Total for 8 years:	2,459	135,227
Mixed Wastes	Actual subtotal*	643	35,365
	Average/month	55	3,032
	Average/year	661	36,379
	Extrapolated Total for 8 years:	5,292	291,034
Nickel	Actual subtotal*	4	220
	Average/year	48	2,640
	Extrapolated Total for 8 years:	384	21,120
Other Wastes	Actual subtotal*	667	36,685
	Average/month	66	3,636
	Average/year	793	43,626
	Extrapolated Total for 8 years:	6,346	349,008
Extrapolated Total All Waste Streams, 8 years:	Actual total:		134,080
			1,236,088

All monthly averages based on documents provided in SPS's 104(e) responses.

Extrapolated totals for each waste type are based on a calculated monthly average volume generated multiplied by 12 months/year, multiplied by 8 years.

These totals may not represent the maximum amount of waste generated by SPS during the timeframe, as SPS provided documentation of waste disposal with only Marvin Jonas/Jonas Waste Removal and DeRewal (SPST00185).

*Actual subtotal - indicates totaled documented amounts, from available file materials.

Table V
Western Electric
Historical Waste Summary: 1969-1977

Location	Waste Type and Amounts Generated	Period (Date)	# of 55-gal Drums	Gallons	Pounds
Reading, PA	<i>Extrapolated 8-yr subtotals:</i>				
	Misc. trash - compacted	1970-1977			9,453,424
	Sludge	1970-1977			3,881,280
	Scrap wood	1970-1977			360,720
	Misc. trash - uncompacted	1970-1977		1,267,200	363,520
	Concentrated acid	1970-1977		1,090,408	
	Waste Solvents, Flam	1970-1977			
	Misc. Waste Materials/Chemicals	1970-1977	1,592		
	Waste abrasive powder	1970-1977	904		566,632
	Waste chlorinated solvents	1970-1977		153,080	
	Reading Extrapolated 8-yr Totals:			2,510,688	14,625,576
North Carolina Works	Average Monthly volume generated				50,618
	Extrapolated Annual volume generated (monthly x 12):		Copper Salts (lbs/month)		
			Copper Salts (lbs/year)		607,410
	North Carolina Works Extrapolated 8-yr total: (no other data available for North Carolina facility waste generation)	1970-1977	Copper Salts (lbs)		4,859,280
Allentown PA					
Allentown facility	Extrapolated Minimum (based on Average Actuals reported) for an 8-year period (e.g. 1970-1977, inclusive):				
	Flammable liquid waste			280,000	
	Non-flammable solvents - trichloroethylene			440,000	
	Acids & Misc. chemicals			87,200	
	Allentown facility Extrapolated 8-Year Minimum Total:			807,200	
Allentown facility	Extrapolated Maximum (based on Estimated Annuals for an 8-year period (e.g. 1970-1977, inclusive)):				
	Flammable liquid waste			640,000	
	Non-flammable solvents - trichloroethylene			192,000	
	Acids & Misc. chemicals			96,000	
	Allentown facility Extrapolated 8-Year Maximum Total:			928,000	

Table VI
Ciba-Geigy, Cranston RI Facility
Historical Waste Summary 1969-1977

Waste Type Generated	Period (Date)	#of 55-gal Drums	Gallons
<i>Based on available shipping/invoice documents:</i>			
Spent sulfuric acid with traces of nitric acid	1976		43,400
Spent sulfuric acid with traces of nitric acid	1977		25,967
Total 1976-1977 based on documents:			69,367
Spent sulfuric acid - monthly average	1976 Monthly Average		8,680
Estimated total annual (monthly average x 12)	1976		104,160
Spent sulfuric acid - monthly average	1977 Monthly Average		6,492
Estimated total annual (monthly average x 12)	1977		77,900
Estimated Annual average (1976 + 1977)/2	Annual Average		91,030
Extrapolated 8-year waste acid volume*			728,239

*The Extrapolated 8-year waste acid volume = (1976 estimate + 1977 estimate +6(average annual))

Table VII
Plymouth Tube, Horsham PA
Historical Waste Summary: 1969-1977

Waste Type and Amounts Generated	Period (Date)	#of 55-gal Drums	Gallons
Based on available shipping documents: waste acid	June 1976 - Nov 1976		28,000
Based on Hawk 1977: spent acid mixture - Maximum (69 loads @ 750 gal/load) Minimum (36 loads @ 750 gal/load)	1972 - 1976 1972 - 1976		51,750 27,000
Based on 1971 Permit Application: spent acid and rinse water - 230 gal/day x 5 days/wk x 52 wks/year x 5 years	1972 - 1976		299,000
Estimated range of waste acid volume generated:	1972 - 1976	28,000 to 299,000 gallons	

Note: the 27,000 gallon estimate is excluded from the estimated range of total waste generated because it is considered superceded by the 28,000 gallon total derived from the 1976 shipping documents.

Table VIII
Simon Wrecking, Willamsport, PA
Historical Waste Summary: 1969-1977

Waste Type and Amounts Generated	Period (Date)	#of 55-gal Drums	Gallons
<i>Based on available shipping documents:</i>			
Paint sludge:	unspecified year, 1970s		11,450
Solvents:	unspecified year, 1970s		29,350
Waste acid:	unspecified year, 1970s		67,200
Waste oil:	unspecified year, 1970s		70,000
Total all documented wastes: (represents a minimum)	unspecified year, 1970s		178,000

Table IX
Sperry/Burroughs
Historical Waste Summary 1969-1977

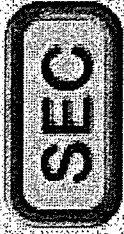
Facility Location	Waste Type Generated	Period (Date)	#of 55-gal Drums	Gallons
Based on limited records from Univac, DeRwal: Blue Bell, PA Blue Bell, PA Utica, NY	Liquid Toner (similar to kerosene) Cyanide "Industrial waste"	1973-1974	unspecified	150
		4/16/1973	3	3,465
		4/25/1972	63	
		Total:	66	3,615

APPENDIX A
Joseph J. Hochreiter
Resume and Bibliography

Senior Environmental Consulting, LLC

The best approach for understanding and solving complex environmental problems

Joseph J. Hochreiter, CGWP / Senior-Level Experience in Environmental Consulting



Senior Environmental Consulting, LLC (SEC)

of Yardley, Pennsylvania was formed in April, 2005 by hydrologist Joseph J. Hochreiter, CGWP, upon his retirement as a Vice President from the environmental consulting firm of Blasland, Bouck & Lee, Inc. (BBL).

Following a 14-year career at the U.S. Geological Survey and more than 17 years as a principal-level scientist at two leading environmental consulting firms, Mr. Hochreiter continues to provide senior-level technical and management consulting to a broad range of clients in the environmental field.

As a sole practitioner at SEC, Mr. Hochreiter can draw upon the technical resources of his former company, BBL, as well as from other strategic partners to develop the best approach for understanding and addressing the environmental challenges facing his clients.

Mr. Hochreiter's professional experience is summarized in each of the following service areas:

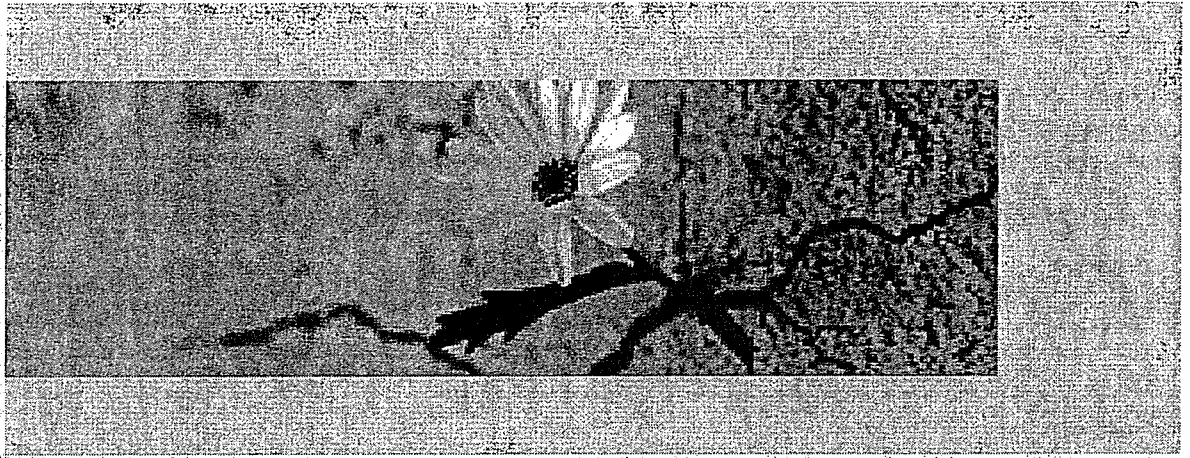
Expert Services

Brownfields Redevelopment

Water Supply Consulting

Remediation and Risk Management

Complex Site Coordination and Management



Public Communication and Conceptual Model Development

Much of this experience represents work performed by Mr. Hochreiter during his 13-year tenure at BBL. Mr. Hochreiter continues to consult BBL as a senior scientist on several of these projects.

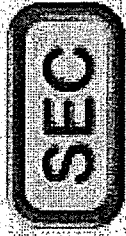
Client references are available upon request for most of the projects summarized in the following sections.

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Senior Environmental Consulting, LLC

The best approach for understanding and solving complex environmental problems

Joseph J. Hochreiter, CGWP / Senior-Level Experience in Environmental Consulting



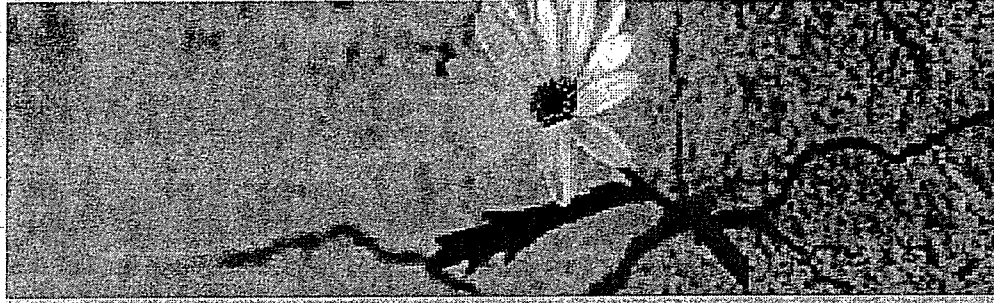
Expert Services

Served as a technical expert on a peer-review panel of the U. S. Army Environmental Center. In this role, evaluated remediation programs at several Army facilities throughout the U.S. Provided expert counsel on a variety of innovative remediation technologies including natural attenuation, chemical oxidation, reactive barrier walls, and soil stabilization.

For a confidential insurance company client, worked with the law firm of Cozen and O'Connor to defend a cost-recovery action initiated by a Pennsylvania municipality regarding remediation of an NPL site (landfill). Selected the testifying expert and directed the development of the technical strategy.

For a New Jersey industry trade association represented by the law firm Flaster Greenberg, prepared an expert report that evaluated technical concerns associated with a State of New Jersey Executive Order and a NJDEP Administrative Order. These orders limited new water supply connections in three municipalities in southern New Jersey. Our analysis was evaluated by a federal court judge and led to a settlement between our client and the state which effectively nullified the orders.

For an environmental construction company that is represented by the law firm of Ernstom & Drester, LLP, prepared an expert report in support of litigation against a former client (a state environmental agency) and its environmental consultant. The expert report evaluated the adequacy of site characterization work that was performed by the state in support of a state-developed Remedial Action



Plan, which the construct company was retained to implement. Disputes arose regarding payment for services rendered by the construction company.

For a confidential steel company (defendant) represented by the law firm of Morgan, Lewis & Bockius, led a team of experts in a case where the site owner (plaintiff) sued a former tenant (defendant) in federal court for cost recovery related to a RI/FS and emergency removal undertaken by the plaintiff at a Pennsylvania plant. Prepared an expert report that documented significant nonconformance by plaintiff's consultant with the National Contingency Plan (NCP). Settlement was reached out of court wherein a shared funding agreement was reached to cover site closure activities. Provided oversight of plaintiff's remediation (including participation in negotiations with PADER and USEPA personnel overseeing the project) and assisted attorneys with qualifying plaintiff's expenditures. Participated in a mediation to resolve a dispute in the final allocation of costs.

Completed a project involving the remediation of chlorinated solvents in groundwater at a manufacturing site in Landing, New Jersey. Working with the law firm of Friedman Siegelbaum, provided expert testimony in litigation that succeeded in recovering costs from third parties and participated in alternate dispute resolution (ADR) with the NJDEP to favorably resolve a NJPDES-permit dispute. Also supervised pilot testing of chemical oxidation technology as an alternative to the pump-and-treat remediation of groundwater (glacial till overlying the Byram Gneiss fractured bedrock aquifer). The project successfully concluded with the submission of a CEA/final remedy report, which established monitored natural attenuation as the final site remedy for groundwater.

For a confidential insurance company being represented by the law firm of Bateman, Coley, Yospin, Kunzman, Davis and Leherer, provided expert report on contaminant transport in defense of a cost-recovery action initiated by a waste transporter involving an NPL site in the New Jersey Pinelands region. Case settled within 60 days following depositions.

For a confidential insurance company that was represented by the law firm of Cozen and O'Connor, provided technical support in defense of a cost-recovery action initiated by a transportation industry concern involving up to 40 potentially contaminated sites in the western U.S.

For a confidential insurance company that is represented by the law firm of Schwartz, Simon & Eddelstein, providing expert services in defense of two separate cost-recovery actions related to petroleum releases to soil/groundwater in New Jersey.

For a confidential group of industrial and commercial companies, provided expert services in their ongoing attempt to mediate a settlement regarding contamination (PCBs) of an industrial building in central New Jersey.

For a confidential southeastern Pennsylvania industrial coatings company (plaintiff) represented by the law firm of Blank, Rome, Comisky and McCauley, served as a non-testifying expert in a cost-recovery action against the former owner of the business (defendant). An out-of-court settlement was reached whereby all regulatory response costs were recovered from the previous owner.

For a confidential Fortune 100 client represented by the law firm of Morgan, Lewis & Bockius, provided forensic support in support of the defense of litigation involving contamination at an industrial site in Philadelphia.

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Senior Environmental Consulting, LLC

The best approach for understanding and solving complex environmental problems

Joseph J. Hochreiter, CGWP / Senior-Level Experience in Environmental Consulting

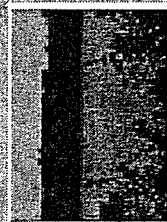


Brownfields Redevelopment

Assisting the property owner (a municipality) with evaluating options for the brownfields redevelopment of a former chlorinated-solvent manufacturing site in Northvale, New Jersey. In the late 1960s, hundreds of drums were buried at the site which contained, or once contained, chlorinated solvents and PCBs. These drums were discovered as part of a PA/SI process initiated by the municipality following foreclosure. Assisted the municipality in obtaining Hazardous Discharge Site remediation fund grants from the state to fund the site investigation. Using these grants, completed an interim removal of all buried drums and drum remnants, evaluated onsite technologies for the remediation of impacted soil, and investigated the impact to groundwater (the site is underlain by remnant glacial lake deposits overlying a fractured sandstone bedrock aquifer, with the latter used regionally as a drinking-water supply).

Representing the developer of a proposed 177-acre international port (multi-purpose industrial complex along the Arthur Kill in Perth Amboy, NJ). Providing services in the area of regulatory coordination, environmental permitting, and site remediation. In this role, providing lead technical support to the developer's two million square foot redevelopment plan for converting old industrial tract to beneficial reuse (including ferry-docking facilities and stadium/arena recreation facilities). Providing the developer with expertise on managing and implementing environmental remediation at this site.

Assisting a Fortune 100 diversified manufacturing company with the remediation and subsequent redevelopment of two



large former pigment plant in northern New Jersey. Providing assistance with ISRA compliance while evaluating options for integrating site remediation strategies with economically viable redevelopment options under the state's Brownfields program.

Assisting the new owner and developer of a former manufacturing facility in Edison New Jersey. Overseeing the decommissioning and remediation of over 100 areas of environmental concern as part of an ISRA site closure.

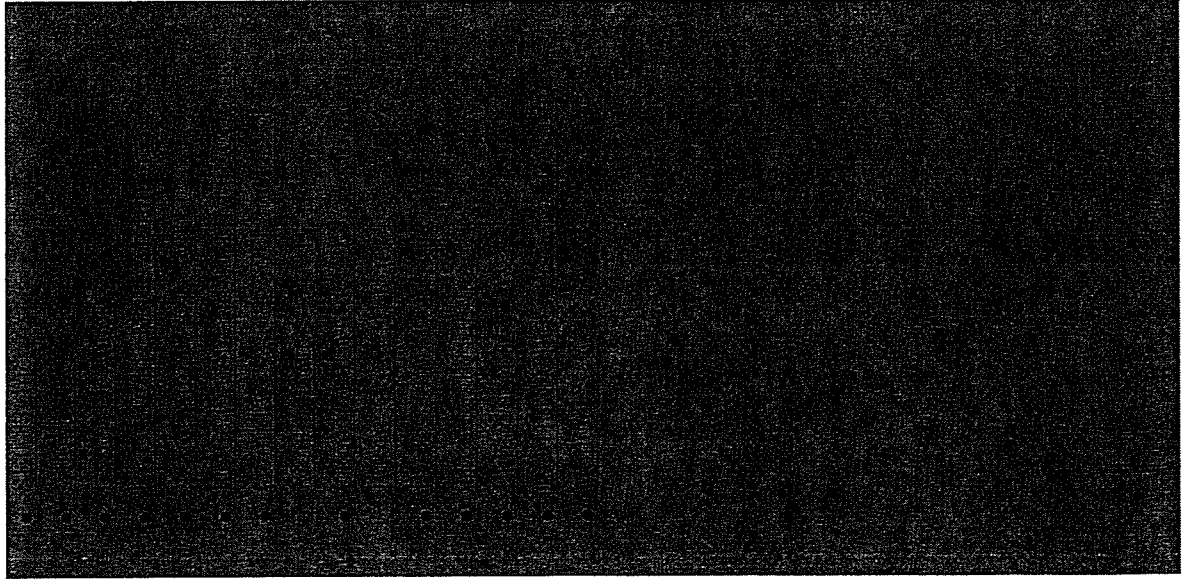
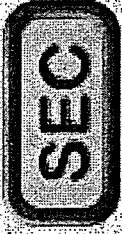
Assisted a New Jersey-based commercial property management firm with their evaluation of a Pennsylvania brownfields development site. SEC conducted due diligence and site investigation of a 100-acre former sewage-sludge disposal facility that has been remediated and developed into a distribution warehouse. The evaluation identified concerns which precluded our client's purchase of the property.

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Senior Environmental Consulting, LLC

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Joseph J. Hochreiter, CGWP / Senior-Level Experience in Environmental Consulting



Water Supply Consulting

As a senior hydrologist with the New Jersey District of the U. S. Geological Survey (USGS), Mr. Hochreiter developed a specialty in coastal plain hydrogeology where he designed, managed, and participated in a variety of benchmark studies of the New Jersey Coastal Plain. The studies in which he participated included assessing the hydrogeologic framework of the New Jersey Coastal Plain, evaluating groundwater flow through the New Jersey and Pennsylvania Coastal Plain, and subregional hydrogeologic evaluations (including aquifer testing and simulation modeling) of the Potomac-Raritan-Magothy aquifer system in central and southern New Jersey and southeastern Pennsylvania.

Currently representing the Builders League of South Jersey (BLSJ) and the New Jersey Builders Association (NJBA) as their water supply consultant. Mr. Hochreiter advises these trade organizations about New Jersey's Water Allocation process and provides expert analysis of ongoing water supply research being conducted by the New Jersey Department of Environmental Protection and the NJ Pinelands Commission. He also provides technical support, as needed, in litigation matters on behalf of these organizations.

Periodically assists residential developers with the design of groundwater-based water supply systems for their proposed communities in both New Jersey and Pennsylvania.

Invited seminar speaker on Water Supply Topics for the National Association of Home Builders, the New Jersey Water Environmental Association, Lorman Educational



Seminars, and others.

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